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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
-oOo-**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACQUES ANTON LANIER,  
a.k.a. John Dupree,

Defendant.

Case No: 2:19-cr-327-GMN-VCF

**Stipulation for a  
Protective Order**

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the public, or any third party not directly related to this case, any and all discovery (the "Protected Material") in this case. The parties state as follows:

1. The indictment in this case first issued on December 31, 2019.
2. The trial is currently set for March 9, 2020. The government desires and intends to produce discovery as soon as possible.
3. The indictment in this case relates to the sex trafficking, coercion and enticement of minors, transfer of obscene material, traveling with the intent to engage in illicit sexual conduct, and tampering with a victim. The government intends to produce discovery in excess

1 of 19,000 pages. Discovery in this matter includes but is not limited to Facebook records, police  
2 reports, interviews with multiple victims and witnesses, and recorded jail calls. The Facebook  
3 records contain conversations between the defendant and over 300 accounts, all believed to be  
4 underage females, including the named victims. The government intends to produce police  
5 reports regarding this offense as well as prior offenses of defendant's criminal history. There are  
6 over 150 jail calls and multiple recorded interviews of victims and witnesses. The discovery  
7 includes personal identifying information of other potential victims, witnesses, and unrelated  
8 persons to this investigation.

9           4.       The government believes that dissemination of the Protected Material could reveal  
10 personal identifying information of potential victims, witnesses, and persons unrelated to this  
11 investigation.

12           5.       In order to protect the potential victims, witnesses, and unrelated persons involved  
13 in and revealed by the Protected Material, the parties intend to restrict access to the Protected  
14 Material in this case to the following individuals: the defendant, attorneys for all parties, and any  
15 personnel that the attorneys for all parties consider necessary to assist in performing that  
16 attorneys' duties in the prosecution or defense of this case, including investigators, paralegals,  
17 experts, support staff, interpreters, and any other individuals specifically authorized by the Court  
18 (collectively, the "Covered Individuals").

19           6.       Without leave of Court, the Covered Individuals shall not:

- 20           a.       make copies for, or allow copies of any kind to be made by any other  
21                   person of the Protected Material in this case or permit dissemination of the  
22                   Protected Material at the Pahrump jail facility, or any other detention  
23                   facility where the Defendant is housed, to include leaving a copy of the  
24                   Protected Material at any detention facility where the Defendant is housed;

- 1           b.     allow any other person to read, listen, or otherwise review the Protected  
2           Material;  
3           c.     use the Protected Material for any other purpose other than preparing to  
4           defend against or prosecute the charges in the indictment or any further  
5           superseding indictment arising out of this case; or  
6           d.     attach the Protected Material to any of the pleadings, briefs, or other court  
7           filings except to the extent those pleadings, briefs, or filings are filed under  
8           seal.

9           7.     Nothing in this stipulation is intended to restrict the parties' use or introduction of  
10          the Protected Material as evidence at trial or support in motion practice.

11          8.     The parties shall inform any person to whom disclosure may be made pursuant to  
12          this order of the existence and terms of this Court's order.

13          9.     Should a reasonable need for this protective order cease to exist, on grounds other  
14          than a Covered Individual or some other person violating or circumventing its terms, the  
15          government will move expeditiously for its dissolution.

16          10.    The defense hereby stipulates to this protective order.

17                   Respectfully submitted,  
18                   For the United States:

19                   NICHOLAS A. TRUTANICH  
20                   United States Attorney

21                   /s/ Bianca R. Pucci

22                   BIANCA R. PUCCI  
23                   Assistant United States Attorney

24                   For the Defense:

/s/ Jason R. Margolis

                    JASON R. MARGOLIS, Esq.  
                    Attorney for JACQUES ANTON LANIER

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE  
DATED: 1-9-2020